

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

CRAIGVILLE TELEPHONE CO. d/b/a	)	
ADAMSWELLS; and CONSOLIDATED	)	
TELEPHONE COMPANY d/b/a CTC,	)	
	)	
Plaintiffs,	)	No. 1:19-cv-07190
	)	
v.	)	Judge Sharon Johnson Coleman
	)	Magistrate Judge Jeffrey T. Gilbert
T-MOBILE USA, INC.,	)	
	)	
Defendant.	)	

**MOTION TO SEAL SELECT TEXT WITHIN AND EXHIBITS TO PLAINTIFFS’  
SUPPLEMENTAL BRIEF IN SUPPORT OF THEIR RENEWED MOTION TO  
COMPEL TMUS’S RESPONSE TO NARROWED RFP 55**

Craigville Telephone Co. d/b/a AdamsWells and Consolidated Telephone Company d/b/a CTC, on behalf of themselves and a class of similarly-situated companies (collectively, “Plaintiffs”), and pursuant to Local Rule 26.2, respectfully move this Court to seal select text from Plaintiffs’ Supplemental Brief in Support of Their Renewed Motion to Compel TMUS’s Response to Narrowed RFP 55 (the “Supplemental Brief”)<sup>1</sup> that references any of the exhibits to the Supplemental Brief (the “Exhibits”).<sup>2</sup>

**ARGUMENT**

The Exhibits to Plaintiffs’ Supplemental Brief were produced by non-party, Equinox Information Systems (“Equinox”), and designated “Confidential – Subject to Protective Order” pursuant to the Parties’ Agreed Confidentiality Order (ECF 164). Pursuant to Local Rule 26.2(b),

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<sup>1</sup> An unredacted version of Plaintiffs’ Supplemental Brief is attached here as Exhibit A.

<sup>2</sup> All of Plaintiffs’ exhibits, Exhibits 1-2, to the Supplemental Brief discuss information contained in documents produced by a non-party, Equinox Information Systems, and have been marked Confidential.

the “court may for good cause shown enter an order directing that one or more documents be filed under seal.” Good cause exists for Plaintiffs to file the redacted textual portions and the Exhibits under seal because Plaintiffs are required to do so by the Agreed Confidentiality Order.<sup>3</sup>

WHEREFORE, Plaintiffs, on behalf of themselves and a class of similarly situated companies, respectfully request that the Court grant Plaintiffs’ Motion to Seal and order that the redacted textual portions of their Supplemental Brief discussing the Exhibits and the Exhibits themselves be filed under seal and remain under seal until further order of this Court.

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<sup>3</sup> Plaintiffs file this Motion to Seal specifically reserving all rights with respect to arguments they intend to raise in the forthcoming briefing regarding Defendant T-Mobile USA, Inc.’s confidentiality designations. (*See* ECF 394.)

Submitted on this 26th day of April, 2023.

/s/ David T.B. Audley

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**CERTIFICATE OF SERVICE**

I hereby certify that on this the 26th day of April, 2023, I served the foregoing **Motion to Seal Select Text Within and Exhibits to Plaintiffs' Supplemental Brief in Support of Their Renewed Motion to Compel TMUS's Response to Narrowed RFP 55** via the ECF system on parties that have consented to the same in accordance with applicable Federal Rules of Civil Procedure and the Local Rules of the U.S. District Court for the Northern District of Illinois.

By: /s/ David T.B. Audley